

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
HELENE MARIE YOHN	:	
Debtor	:	CASE NO. 1:22-bk-01760
:		
U.S. BANK TRUST NATIONAL	:	
ASSOCIATION, NOT IN ITS	:	
INDIVIDUAL CAPACITY BUT	:	
SOLELY AS OWNER TRUSTEE FOR	:	
RCF 2 ACQUISITION TRUST	:	
Movant	:	
:		
vs.	:	
HELENE MARIE YOHN	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. The codebtor is deceased.
9. Admitted that the debtor is two months behind; however, she intends to cure the arrearages through an amended plan and therefore this paragraph is denied.
10. Admitted.
11. The Debtor lacks knowledge or information, such as a pay off statement, sufficient to form a belief as to the truth of this averment, and therefore denies the same.
12. Admitted.

13. Admitted; however, in this instance, the default is relatively small and debtor intends to cure via an amended plan therefore it is denied that there is cause for relief.
14. Admitted; however, in this instance, the default is relatively small and debtor intends to cure via an amended plan therefore it is denied that there is cause for relief.
15. Denied. The property is the Debtor's home and is necessary for the reorganization. The default is relatively small and debtor intends to cure via an amended plan therefore it is denied that there is cause for relief.
16. Denied. The property is the Debtor's home and is necessary for the reorganization. The default is relatively small and debtor intends to cure via an amended plan therefore it is denied that there is cause for relief or waiver of rule Fed.R.Bankr.P. 4001(a)(3).

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Attorney ID #87577
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477
karagendron@gmail.com